



TOWN OF PAXTON

Board of Selectmen

697 Pleasant Street, Paxton, MA 01612

508-754-7638 Fax: 508-797-0966

Michael T. Quinlivan, Chairman,

John F. Malone, Vice-Chairman, Frederick G. Goodrich Clerk

Town Administrator: Charles T. Blanchard

June 14, 2006

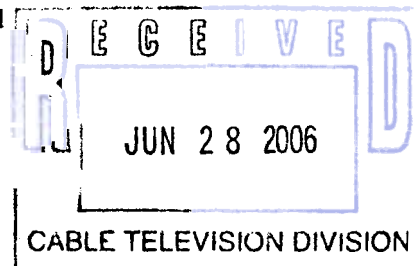
Andrea Nixon

Clerk, Cable Television Division

Department of Telecommunications and Energy

One South Station

Boston, MA 0211



Dear Clerk,

The Town of Paxton, would like to register its strong opposition to Verizon's March 16, 2006, rulemaking petition filed with the Cable Division of the Department of Telecommunications and Energy. Verizon's petition proposes extremely unreasonable new rules for initial cable licensing.

The proposed rules would require a municipality to hold a public hearing on an initial cable television license application within 60 days of the application filing, and would require only 30 days from the time for the public hearing for the municipality to approve or disapprove the application, and issue the actual license in case of approval.

As most local officials will tell you, it is impossible to conclude a proper initial license application review, negotiation, licensee drafting and issuance within 30 days of the public hearing. Such an initial licensing time frame would be untenable in the best of circumstances, and is particularly untenable now in light of the many questions of first impression and complex issues raised by the non-standard terms and conditions commonly reported to be included in Verizon-proposed cable licenses.

As you know from RCN's initial licensing experience, cable operators willing to negotiate customary and standard cable licenses enjoy reasonable and fast municipal licensing. The existing license timetables have worked for many decades. They should not be changed at the behest of a single proponent. Note that Congress contemplated and provided for a three-year renewal process when it more comprehensively and carefully set forth cable licensing rules in the 1984 Cable Act. This framework worked well for decades and there is no rational basis for casting aside the time tested licensing rules and replacing them with radically abbreviated rules.


The Town of Paxton has heard several complaints from residents regarding the poor service offered by Verizon and despite numerous requests directly to Verizon have failed to have many of these issues resolved.

Municipal officials who are responsible for implementing licensing and who are accountable to the public are in opposition on these proposed rules. Municipal official are

concerned that under the proposed rules, our community and cities and towns across the state will be boxed into an untenable 30 day post-hearing licensing process, and will lose the ability to properly review and negotiate Verizon cable proposal. This is not even close to what is reasonable needed for a fair reasonable licensing process. The Massachusetts Cable Division should reject the Verizon petition and allow local officials to continue serving their constituents as they have been doing for decades.

Thank you for your attention to this matter. If you have any further questions or desires further comment, please do not hesitate to contact us.

Sincerely,


Michael T. Quinlivan, Chairman
Paxton Board of Selectmen

